

**EXHIBIT A**

**Proposed Order**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:  HEMATITE HOLDINGS INC.,  Debtor in a Foreign Proceeding.	Chapter 15  Case No. 20-12387 ( )  <b>Related Docket No.:</b> ____
In re:  HEMATITE INDUSTRIAL PRODUCTS INC.,  Debtor in a Foreign Proceeding.	Chapter 15  Case No. 20-12388 ( )  <b>Related Docket No.:</b> ____
In re:  HEMATITE MANUFACTURING INC.,  Debtor in a Foreign Proceeding.	Chapter 15  Case No. 20-12389 ( )  <b>Related Docket No.:</b> ____
In re:  CANADIAN PAVACO INC.,  Debtor in a Foreign Proceeding.	Chapter 15  Case No. 20-12390 ( )  <b>Related Docket No.:</b> ____
In re:  PAVACO HOLDINGS U.S. INC.,  Debtor in a Foreign Proceeding.	Chapter 15  Case No. 20-12386 ( )  <b>Related Docket No.:</b> ____
In re:  HEMATITE, INC.,  Debtor in a Foreign Proceeding.	Chapter 15  Case No. 20-12391 ( )  <b>Related Docket No.:</b> ____

In re:

HEMATITE AUTOMOTIVE PRODUCTS  
INC.,

Debtor in a Foreign Proceeding.

Chapter 15

Case No. 20-12392 ( )

Related Docket No.: \_\_\_\_

**ORDER AUTHORIZING AND DIRECTING JOINT ADMINISTRATION  
OF CHAPTER 15 CASES FOR PROCEDURAL PURPOSES ONLY**

UPON CONSIDERATION of the motion (the “Motion”)<sup>1</sup> of the Foreign Representative for entry of an order authorizing and directing the joint administration of the Debtors’ related Chapter 15 Cases; and the Court having considered and reviewed the Motion and the Chapter 15 Petitions and all related documents filed contemporaneously therewith, including, but not limited to, the *Declaration of Jacques Nadeau in Support of the Debtors’ Chapter 15 Petitions and First Day Pleadings in Foreign Proceeding*, including all facts specifically alleged and verified therein; and upon the record herein; and due and sufficient cause appearing therefor; and the Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware dated February 29, 2012; this being a core proceeding pursuant to 28 U.S.C. § 157(b)(2); and venue of this proceeding and the Motion in this District being proper pursuant to 28 U.S.C. §§ 1401(1) and (3); and the Court having determined that the relief requested in the Motion is in the best interests of the Debtors, their creditors, and other parties in interest in these Chapter 15 Cases; and the Foreign Representative provided an adequate opportunity for a hearing on the Motion under the circumstances; it is hereby ORDERED

1. The Motion is GRANTED, as set forth herein.

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to such terms in the Motion.

2. The above-captioned chapter 15 cases are consolidated for procedural purposes only and shall be jointly administered by the Court under the case of Hematite Holdings Inc., Case No. 20-12387.

3. The caption of the jointly administered Chapter 15 Cases shall read as follows:

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re:

HEMATITE HOLDINGS INC., *et al.*,<sup>1</sup>

Debtors in a Foreign Proceeding.

Chapter 15

Case No. 20-12387 ( )

Jointly Administered

<sup>1</sup> The U.S. Debtors in these chapter 15 cases and the last four digits of their U.S. Federal Employer Identification Numbers are as follows: Pavaco Holdings U.S. Inc. (5569); Hematite, Inc. (3799); and Hematite Automotive Products Inc. (5382). The Canadian Debtors in these chapter 15 cases and the last four digits of their unique identifier are as follows: Hematite Holdings Inc. (8581); Hematite Manufacturing Inc. (4900); Hematite Industrial Products Inc. (7706); and Canadian Pavaco Inc. (5315). The U.S. Debtors and the Canadian Debtors are referred to herein, collectively, as the “Debtors.” The Debtors’ principal offices are located at 659 Speedvale Avenue West, Guelph, Ontario, N1K 1E6, Canada.

4. The foregoing caption shall satisfy the requirements set forth in sections 342(a) and (c)(1) of the Bankruptcy Code.

5. All original pleadings shall be captioned as set forth in paragraph 3, and all original docket entries shall be made in the case of Hematite Holdings Inc., Case No. 20-12387.

6. An entry shall be made on the docket of each of the other Debtors’ Chapter 15 Cases that is substantially similar to the following:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure and Rule 1015-1 of the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware directing joint administration of this chapter 15 case with the chapter 15 case of Hematite Holdings Inc., Case No. 20-12387. All further pleadings and other papers filed in this case shall be filed in, and all further

docket entries shall be made in, the docket of Hematite Holdings Inc.,  
Case No. 20-12387.

7. The Foreign Representative shall maintain, and the Clerk of the United States Bankruptcy Court for the District of Delaware shall keep, one consolidated docket, one file, and one consolidated service list in these Chapter 15 Cases.

8. Nothing contained in the Motion or this Order shall be deemed or construed as directing or otherwise effecting a substantive consolidation of these Chapter 15 Cases.

9. The Foreign Representative is authorized to take all actions necessary to effectuate the relief granted pursuant to this Order in accordance with the Motion.

10. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation or interpretation of this Order.